PATENT Customer No. 22,852 Attorney Docket No. 9090-0002-02

REMARKS

Applicants wish to thank the Examiner and the Supervising Examiner for the courtesy extended to Applicants' representatives during the personal interview on August 20, 2003. As discussed in that interview, Applicants submit this amendment to further clarify the claimed invention and respond to the Final Office Action of March 26, 2003 and the Advisory Action issued July 11, 2003.

In the Final Office Action, the Examiner rejected claims 16-18 under 35 U.S.C. § 112, second paragraph, as being indefinite for lacking proper antecedent basis. He further rejected claims 1-20 under 35 U.S.C. § 102(e) as anticipated by <u>Tamano et al.</u>, U.S. Patent No. 6,032,157. In an Amendment After Final, Applicants cancelled claim 5, amended claims 1 and 15-19, and presented arguments. In response, the Examiner issued the July 11, 2003 Advisory Action alleging that the claims remained anticipated by <u>Tamano et al.</u>

Section 112 Rejections

In the Amendment After Final, Applicants amended claims 16-18 to recite proper antecedent basis for all claim elements. Therefore, as discussed in the personal interview, the section 112 rejections of claims 16-18 should be withdrawn.

Section 102 Rejections

In the Final Office Action and the subsequent Advisory Action, the Examiner asserted that claims 1-20 are anticipated by <u>Tamano et al.</u> Applicants continue to maintain that the claims presented in the Amendment After Final are allowable over the reference. However, by this Amendment, Applicants have amended the claims to further clarify the invention.

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To anticipate a claim under 35 U.S.C. § 102, a reference must teach every element of the claim. M.P.E.P. § 2131.01 (8th ed. 2001, revised February 2003). Because <u>Tamano et al.</u> does not disclose every element of the amended claims, the section 102 rejections should be withdrawn.

Tamano et al. discloses a system in which a user links two images, such as maps, by choosing a correspondence between objects on the images. The link enables the user to retrieve previously-stored attribute information about the corresponding objects. (Tamano et al., col. 2, II. 40-52.) To link two images, the user views the images and inputs the correspondence "by selecting an object in the second image information." (Id.) Therefore, the system of Tamano et al. teaches that the two images contain objects that are present on the two images before any correspondence is determined. (Id., col. 4, II. 6-25.)

Amended independent claims 1, 15, and 19 recite, among other things, "determining a second annotation corresponding to the first annotation" and "adding the second annotation to the second map." As discussed above, <u>Tamano et al.</u> discloses images containing pre-existing objects. Nothing is added to the images in the reference. Therefore, the reference does not teach determining a second annotation and adding the second annotation to the second map, as recited in amended claims 1, 15, and 19. Because <u>Tamano et al.</u> fails to disclose each element of amended claims 1, 15, and 19, Applicants respectfully request the withdrawal of the section 102 rejections of claims 1, 15, and 19.

Claims 2-4 and 6-14 depend from claim 1. Claims 16-18 depend from claim 15.

Claim 20 depends from claim 19. Because <u>Tamano et al.</u> fails to teach every element

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of amended independent claims 1, 15, and 19, it also fails to teach every element of the claims that depend therefrom. Therefore, Applicants request the withdrawal of the section 102 rejections of claims 2-4, 6-14, 16-18, and 20.

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of pending claims 1-4 and 6-20.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

By

Respectfully submitted,

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Dated: September 16, 2003

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